



Red Hill Administrative Order on Consent

Role, Function, and Status

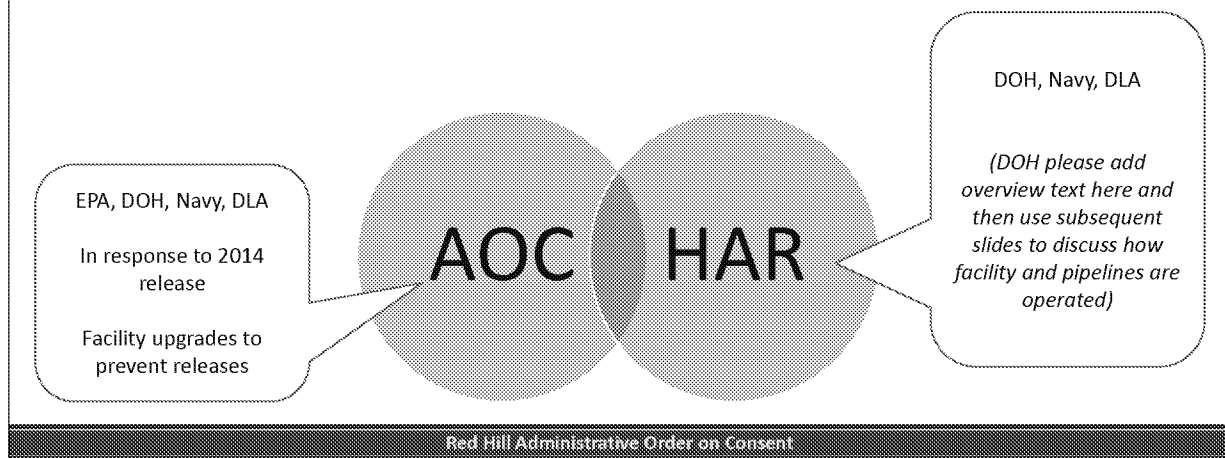
Fuel Tank Advisory Committee

October 28, 2021

Red Hill Administrative Order on Consent

R 201
G 233
B 255

Administrative Order on Consent and State of Hawai'i Underground Storage Tank Program



How Red Hill Facility is Regulated Under State of Hawai'i Underground Storage Tank Program

(Text here, duplicate slides as needed for additional slides, ideally you would address how pipelines are regulated in the bullets or information you share here. I'm thinking you should keep the background to these slides white to segregate the HAR info from the AOC info (which has a blue background))

Red Hill Administrative Order on Consent

What is the Red Hill Administrative Order on Consent?

An enforceable agreement between:

**U.S. Environmental Protection Agency
State of Hawai'i Department of Health
U.S. Navy
Defense Logistics Agency**

The AOC, which was issued in response to the January 2014 fuel release from the Red Hill Facility, requires the Navy to implement environmental analyses and infrastructure improvements to protect human health and the environment.

AOC Parties

U.S. Navy and Defense Logistics Agency

Owner/operator of the
Red Hill facility

Responsible for the design,
operation, maintenance,
monitoring, and
release response actions

U.S. EPA and Hawai'i DOH

Regulatory Agencies

Enforce environmental laws
and regulations

Oversee implementation of the
Administrative Order on Consent

Red Hill Administrative Order on Consent

Administrative Order on Consent

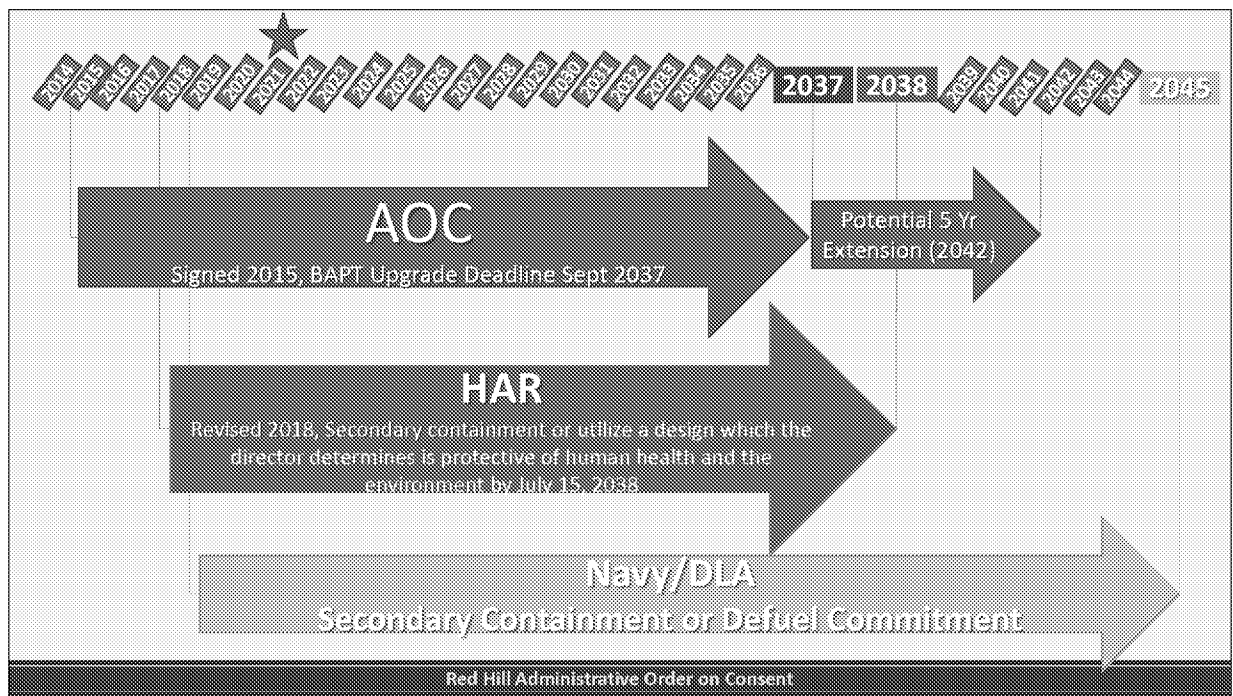
- Signed in 2015 in response to a January 2014 release of 27,000 gallons of fuel
- Purpose:
 - Ensure that the groundwater resource in the vicinity of the facility is protected
 - Ensure that the facility is operated and maintained in an environmentally protective manner



Major components of this work:

1. Improve upon existing tank inspection and repair process to prevent releases of fuel
2. Study feasibility of upgrading the tank structures including, but not limited to, installing secondary containment
3. Increase frequency of tank tightness testing and implement improvements to release detection technologies
4. Develop models to better understand groundwater flow in the areas around the facility and evaluate the fate and transport of contaminants in the subsurface around the facility
5. Develop a risk/vulnerability assessment to understand the potential for and potential impacts of fuel releases from the facility on the island's drinking and groundwater supplies.

All Red Hill tanks in
operation will deploy
BAPT,
as approved by the
Regulatory Agencies,
by
2037



Section 1**Project Management****Sections 2-5, 8****Tank Infrastructure Improvements**

- Section 2: Tank Inspection, Repair, Maintenance
- Section 3: Tank Upgrade Alternatives
- Section 4: Release Detection / Tank Tightness Testing
- Section 5: Corrosion and Metal Fatigue Practices
- Section 8: Risk and Vulnerability Assessment

Sections 6-7**Environmental Investigation and Remediation**

- Section 6: Investigation and Remediation of Releases
- Section 7: Groundwater Protection and Evaluation



AOC Scope of Work Updates



Section 1

Project Management

Sections 2-5, 8

Tank Infrastructure Improvements

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AOC Scope of Work Updates



HAWAII STATE
DEPARTMENT
OF HEALTH

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PURPOSE

Identify and evaluate the various tank upgrade alternatives and then select and implement the Best Available Practicable Technology (BAPT) and Tank Inspection, Repair and Maintenance (TIRM) procedures that can be applied to the in-service tanks at the facility to prevent releases into the environment.

TUA is re-evaluated once every five years from the approval of the initial TUA Decision Document.

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AOC Scope of Work Updates



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HISTORY

2019 Navy/DLA Submitted Tank Upgrade Alternatives and Release Detection Decision Document

2019 EPA/DOH Solicited Public Comments

2020 EPA/DOH Issued a Notice of Deficiencies Letter

2021 Navy/DLA Submitted a Tank Upgrade Alternatives and Release Detection Decision Document Supplement

NEXT STEP

EPA/DOH Issue Decision

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AOC Scope of Work Updates



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PURPOSE

To evaluate the possibility and extent of corrosion and metal fatigue as well as practices to control corrosion and metal fatigue at the facility. Based on this evaluation, procedures under sections 2 or 3 of the SOW may be modified.

HISTORY

2019 Navy/DLA submitted a Destructive Testing Results Report to the Regulatory Agencies

2020 EPA/DOH disapproved report

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AOC Scope of Work Updates



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CURRENT ACTIVITY

2021 Navy and DLA submitted 5.4
Execution Plan: Decision on Need
for and Scope of Modified
Corrosion and Metal Fatigue
Practices Amendment #1

NEXT STEP

EPA/DOH issue decision

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AOC Scope of Work Updates



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PURPOSE

To assess the level of risk the facility may pose to the groundwater and drinking water aquifers and to inform the parties in subsequent development of BAPT decisions

BACKGROUND

2019 Navy/DLA submitted Quantitative Risk and Vulnerability Assessment Phase 1 (Internal Events without Fire and Flooding) and Alternative Location Study

2019 EPA/DOH Approved Phase 1 RVA with Requirements to Complete Additional Work

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AOC Scope of Work Updates



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BACKGROUND CONT.

2020 Navy/DLA Submitted a Revised 8.2 Phase 2 Risk/Vulnerability Assessment (RVA) Scope of Work to address initiating events from flooding, fire, seismic, and other external events

2021 EPA/DOH Issued a Notice of Deficiency

NEXT STEP

Navy/DLA to submit a revised Phase 2 RVA Scope of Work

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AOC Scope of Work Updates



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PURPOSE

Monitor and characterize the flow of groundwater around the facility. Information shall be used to update the existing Groundwater Protection Plan. Work may include the installation of additional monitoring wells.

BACKGROUND

2020 Navy/DLA submitted Groundwater Flow Model Report

NEXT STEP

EPA/DOH to issue decision

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Regulatory Agency Contacts

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